



**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

PRAMIL S.R.L. (ESAPHARMA),	]	
Petitioner,	]	
	]	
v.	]	Cancellation No. 92032341
	]	
MICHEL FARAH,	]	
Registrant.	]	
	]	

**PETITIONER'S RESPONSE TO REGISTRANT'S**  
**SUPPLEMENT TO MOTION TO SUSPEND**

On March 5, 2007, the Registrant filed with the Board a supplement to his Motion to Suspend Proceeding. Petitioner herein respectfully opposes the same.

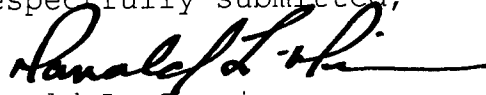
Registrant is relying upon a decision of the federal court in Florida's Judgment issued nearly one and one-half years ago against International Beauty Exchange. Neither the Registrant herein nor International Beauty Exchange, Inc. were parties in the Florida Judgment.

Additionally, Registrant relies upon a Default Judgment entered earlier this year against the Petitioner in the same civil action wherein the Registrant was not a party.

Counsel wishes the Board to be aware that the present Petitioner is a foreign entity (Italy) and there is no evidence that it was ever properly served in the Florida case. Clearly, Petitioner took no part in the civil action, never entered an appearance nor did it ever file any pleadings in that case.

For the reasons set forth in Petitioner's previous objections to further delays and suspension, denial of the present motion is solicited.

Respectfully submitted,

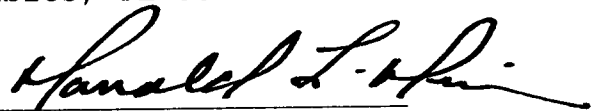


Donald L. Dennison  
Dennison, Schultz, Dougherty &  
MacDonald  
Attorneys for Petitioner  
1727 King Street  
Suite 105  
Alexandria, VA 22314  
(703)837-9600 Ext. 15

March 12, 2007

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of Petitioner's Response to Motion for Reconsideration was served this 12<sup>th</sup> day of March, 2007 by first class mail with proper postage affixed on counsel for the Registrant, David M. Rogero, Esq., 2600 Douglas Road, Suite 600, Coral Gables, FL 33134.



Donald L. Dennison